

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

Kyle Lydell Canty **17-CV-00227** RAJ-MAT
(Name of Plaintiff)

vs.

CIVIL RIGHTS COMPLAINT
BY A PRISONER UNDER 42
U.S.C. § 1983

Runette Mitchell
L. Pait
H. Hendershot-Brown

(Names of Defendant(s))

I. Previous Lawsuits:

A. Have you brought any other lawsuits in any federal court in the United States while a prisoner?:

☒ Yes ☐ No

B. If your answer to A is yes, how many?: 1. Describe the lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper using the same outline.)

1. Parties to this previous lawsuit:

Plaintiff: Kyle Lydell Canty

Defendants: King County, et al

2. Court (give name of District): Western District of WA

3. Docket Number: C16-1655-RAJ-JPD

4. Name of judge to whom case was assigned: Richard A. Jones

5. Disposition (For example: Was the case dismissed as frivolous or for failure to state a claim? Was it appealed? Is it still pending?): Still Pending - Current

6. Approximate date of filing lawsuit: Oct 24, 2016

7. Approximate date of disposition: Still Pending - Current

II. Place of Present Confinement: King County Correctional Facility

A. Is there a prisoner grievance procedure available at this institution? ☒ Yes ☐ No

B. Have you filed any grievances concerning the facts relating to this complaint? ☒ Yes ☐ No

If your answer is NO, explain why not:

C. Is the grievance process completed? ☒ Yes ☐ No

If your answer is YES, ATTACH A COPY OF THE FINAL GRIEVANCE RESOLUTION for any grievance concerning facts relating to this case.

III. Parties to this Complaint

A. Name of Plaintiff: Kyle Lydell Canty Inmate No.: 216035994

Address: 500 5th Avenue Seattle WA 98104

(In Item B below, place the full name of the defendant, his/her official position, and his/her place of employment. Use item C for the names, positions and places of employment of any additional defendants. Attach additional sheets if necessary.)

B. Defendant: Runette Mitchell Official Position: admin

Place of employment: King County Correctional Facility

C. Additional defendants L. Pait (inmate management),
H. Hedershot Brown (Food Services manager),
E. Bautista (Major) T. Clark (Major)

IV. Statement of Claim

(State here as briefly as possible the facts of your case. Describe how each defendant is involved, including dates, places, and other persons involved. Do not give any legal arguments or cite any cases or statutes. If you allege a number of related claims, number and set forth each claim in a separate paragraph. Attach additional sheets if necessary.)

King County Correctional Facility and it's employees acting as a "local government" has consistently, knowingly, intentionally, maliciously, and willfully violated the RLUIPA Act, The Establishment Clause of the first amendment of the U.S. Constitution, The Free Exercise Clause of the first amendment of the U.S. Constitution, and The Fourteenth Amendment of the U.S. Constitution.

(1) MR. Canty's "Kosher" Religious diet was denied flat out. The King County Correctional facility employee lies on paper for the reason for the rejection of the form that MR. Canty filled out

(2) MR. Canty has been refused the right to meet with a clergy person of his particular faith consistently. King County Correctional facility then starts ignoring MR. Canty's requests.

(3) MR. Canty has been refused the right to participate in King County Correctional facility's program that is a big part of his religion and that is Yogacara better known as Yoga which is a federal funded program here at this jail, as are all of the programs that King County Jail offers for all inmates. Part Four is continued on 5 additional pages there is just not enough space in this area

V. Relief

(State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.)

MR. Canty's Prayer for Relief is 6,000,000
Six million Dollars and no cents, for the
reasons further explained in the additional
pages that are attached to this form

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 6th day of Feb 20 17.

Prepared by: 2 02/06/2017
(Signature of Plaintiff)

JURISDICTION and Venue

King County Correctional Facility and its employees acting as a "local government" has consistently, knowingly, intentionally, maliciously, and willfully violated The RLUIPA ACT, The Establishment Clause of the first amendment of the U.S. Constitution, The Free Exercise Clause of the first amendment of the U.S. Constitution, and the Fourteenth amendment of the U.S. Constitution.

FACTS

- (1) MR. Canty's "Kosher" Religious diet was flat out denied. (Yes this facility indeed offers a "Kosher diet")
- (2) MR. Canty has been refused the right to meet with a Clergy person of his particular faith consistently. King County Correctional Facility then starts ignoring MR Canty's requests and even threatens him by telling him via written response, if he continues to write grievances he would be sent to the hole/isolation/Ag Seg/Solitary Confinement

(3) MR. Canty has been refused the right to participate in King County Correctional facility's program that is a big part of his religion and this program is called yogaCara better known as yoga, which is a federal funded program here at this facility, all of the programs offered at this Correctional facility comes from federal funds.

Exhaustion of Legal Remedies

(4) MR. Canty has exhausted and gone above and beyond this Correctional facility's grievance system, MR. Canty has even filed a King County Claims for damages form regarding these religious violations just so he could prove to the Federal Courts that King County and its Correctional facility has knowingly, intentionally, maliciously, and willfully violated MR. Canty's sincere religious beliefs and practices. attached to the public claim for damages form is most of the grievances and unbelievable responses to MR. Canty's grievances

The King County Claim number is 58738, however this is clearly about Violations of the U.S. Constitution, and other federal acts - The only reason why the Claim was filed with the County is to leave the paper trail so that King County can't run from Justice! According to King County Correctional Facility's Correctional officers and other staff Quote...

"a lot of inmates file lawsuits but none of them win". So indeed MR. Canty is now challenging King County along with King County Correctional Facility and their employee's listed in this Complaint.

Legal Claims

(5) MR. Canty has been forced to eat Pork, gmo foods, foods that haven't been prepared separate from other foods, foods that haven't been prayed over, foods that contain (aspartame) - a ingredient that has been linked to horrible effects to the human body. MR. Canty has been throwing up, has lost a lot of weight, and has experienced intentional infliction of E.D.

(6) MR. Canty has read the King County Correctional facility inmate handbook, in the inmate handbook there is a Statement that Claims in bold letters Quote "Jail meals do Not Contain pork, pork products, pork bi-products, food Containing Shelfish" however When MR. Canty Sent a inmate Kite to the Kitchen and he asked them for a list of ingredients to all meals served at this facility including the regular meals, Kosher meals, Halal meats, and Vegan meals, The response he received back was Quote "denied".

Conclusion

(7) In Conclusion both of MR. Canty's religions state that MR. Canty is not to eat or drink any harmful foods or drink any harmful drinks. MR. Canty's Sincere religious beliefs come from the Jewish faith and the Buddhist faith MR. Canty has two religions that he follows Sincerely! that both say the same thing regarding this topic

(8) Prayer for Relief

"Every person who, under color of any Statute, ordinance, regulation, custom or usage, of any State or Territory, or the District of Columbia Subjects, or Causes to be Subjected, any Citizen of the United States or other person within the Jurisdiction thereof to the deprivation of any rights, Privileges, or immunities secured by the Constitution and laws, shall be liable to the party injured in an action at law, Suit in equity or other proper proceeding for redress. Based upon the Preponderance of evidence of negligence, injury, intentional infliction of Emotional Distress, and a total disregard for not only MR. Canty's two sincere religious beliefs, but also for a total disregard to the amendments of the U.S. Constitution and other federal laws and acts MR. Canty's Prayer for Relief is 6,000,000 → Six million Dollars and no Cents →

Prepared by:

2-02/06/2017

Checklist Page

(1) MR. Canty's Certified inmate trust account history for the last six months.

(2) two paper grievances with tracking numbers pertaining to MR. Canty's Sincere Religious beliefs, and also tracking numbers of 0117 017, 0117 077 dealing with the same issues AS MR. Canty has stated, a Claim for damages form was filed with King County and more evidence can be found there, it's public information Claim # 58738

(3) Stamped/Received Complaint forms filed with King County Office of Civil rights, and also King County ombudsman's office.

Prepared by:

2/02/06/2017

Kyle Lydell Canty

Kyle Lydell Canty

BA# 216035994

500 5th Avenue


Seattle WA 98104

Name Kyle Lydell Canty
Bkg. # 216035994
King County Correctional Facility
500 Fifth Avenue
Seattle, WA 98104-2332

Legal mail

Clerk, U.S. District Court
U.S. Courthouse
700 Stewart Street, Suite 2310
Seattle, WA 98101



 **US POSTAGE**
\$01.61⁰
First-Class
Mailed From 98104
02/09/2017
032A 0061807160

Legal mail